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INTERVENTION ORIGINAL



Timothy M. Hogan (004567) ARIZONA CENTER FOR LAW IN THE PUBLIC INTEREST 202 E. McDowell Rd., Suite 153 Phoenix, Arizona 85004 (602) 258-8850

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AZ CORP COMMISSION DOCKET CONTROL

Attorneys for Western Resource Advocates

BEFORE THE ARIZONA CORPORATION COMMISSION Commission DOCKETED

MAR - 7 2008

DOCKETED BY

MIKE GLEASON, CHAIRMAN WILLIAM A. MUNDELL JEFF HATCH-MILLER KRISTIN K. MAYES **GARY PIERCE**

IN THE MATTER OF THE APPLICATION OF TUCSON ELECTRIC POWER COMPANY FOR APPROVAL OF ITS **DEMAND-SIDE MANAGEMENT** PROGRAM PORTFOLIO PLAN.

Docket No. E-01933A-07-0401

PETITION FOR LEAVE TO INTERVENE OF WESTERN RESOURCE ADVOCATES

Pursuant to the Rules of Practice and Procedure of the Arizona Corporation Commission (Commission), Western Resource Advocates (WRA) hereby moves to intervene in the above-captioned docket and, in support thereof, states as follows:

WRA is a regional environmental law and policy center serving the Rocky 1. Mountain and Desert Southwest states. WRA has been involved in proceedings before the Commission for nearly fifteen years and has been granted intervenor status in numerous dockets. As part of this work, WRA has represented a number of other Arizona non-profit organizations on energy issues. WRA has a board member, staff and members who live and recreate in Arizona and/or are TEP electric ratepayers.

- 2. WRA's Energy Program promotes policies and programs designed to encourage the development of clean energy power production technologies, energy efficiency, renewable resources, distributed generation, and other measures that help reduce the environmental impacts of meeting the demand for energy services and encourage sustainable rural economic development, while minimizing the costs and risks to ratepayers of fuel price volatility and environmental regulatory requirements. It has appeared in rate proceedings before the Commission and in other state and federal regulatory forums to recommend, among other things, improvements in rate design for sending efficient price signals and cost recovery mechanisms for investments in renewable energy and energy efficiency.
- 3. Intervention by WRA will not unduly broaden the issues or delay the proceeding. WRA does not yet know what position it will take in this proceeding.
- 4. WRA requests that all pleadings, correspondence, discovery, and other documents be served on the following:

Timothy M. Hogan Arizona Center for Law in the Public Interest 202 E. McDowell Road, Suite 153 Phoenix, AZ 85004 (602) 258-8850 fax (602) 258-8757 thogan@aclpi.org

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Wherefore, WRA respectfully requests that the Commission issue an order granting its Motion to Intervene in the above-captioned proceeding.

DATED this 7th day of March, 2008

ARIZONA CENTER FOR LAW IN THE PUBLIC INTEREST

Timothy M. Hogan

202 E. McDowell Rd., Suite 153

Phoenix, Arizona 85004

Western Resource Advocates

ORIGINAL and 13 COPIES of the foregoing filed this 7th day of March, 2008, with:

Docketing Supervisor

Docket Control

|| Arizona Corporation Commission

1200 W. Washington

Phoenix, AZ 85007

COPIES of the foregoing

Electronically mailed this

7th day of March, 2008, to:

All Parties of Record

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